

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CELLULAR COMMUNICATIONS)
EQUIPMENT LLC,)
)
Plaintiff,)
)
v.)
)
Case No. 2:15-cv-576)
AT&T INC.,)
AT&T MOBILITY LLC,)
ALCATEL-LUCENT S.A.,)
ALCATEL-LUCENT USA, INC.,)
ERICSSON INC.,)
TELEFONAKTIEBOLAGET LM)
ERICSSON,)
APPLE INC.,)
HTC CORPORATION,)
HTC AMERICA, INC.,)
LG ELECTRONICS, INC.,)
LG ELECTRONICS USA, INC.,)
SAMSUNG ELECTRONICS CO. LTD.,)
SAMSUNG ELECTRONICS AMERICA,)
INC.,)
SAMSUNG TELECOMMUNICATIONS)
AMERICA LLC,)
ZTE CORPORATION,)
ZTE USA INC., and)
ZTE SOLUTIONS, INC.)
)
Defendants.)
)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER, OR
OTHERWISE RESPOND TO PLAINTIFF’S AMENDED COMPLAINT**

LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively herein, the “LG Defendants”), without waiving any defenses described or referred to in Fed. R. Civ. P. 12, move the Court to extend the time within which the LG Defendants are required to move, answer, or

otherwise respond to Plaintiff's Amended Complaint. In support of their Motion, the LG Defendants state as follows:

1. On April 30, 2015, Plaintiff filed an Original Complaint naming LG Electronics, Inc. and LG Electronics U.S.A., Inc. as Defendants alleging infringement of United States Patent Numbers 8,457,022, 8,570,957, and 8,867,472.
2. On July 22, 2015, Plaintiff filed an Amended Complaint naming LG Electronics, Inc. and LG Electronics U.S.A., Inc. as Defendants alleging infringement of United States Patent Numbers 8,457,022, 8,570,957, 8,867,472, 8,457,676, 9,025,590, and 9,078,262.
3. Counsel for the LG Defendants will agree to accept service for LG Electronics, Inc., a foreign entity, in exchange for an extension of time for LG Electronics, Inc. and LG Electronics U.S.A., Inc. to respond to Plaintiff's Complaint until November 16, 2015. This extension will make service easier for the parties and eliminate the need for the formalities under Fed. R. Civ. P. 4.
4. The LG Defendants' agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, the LG Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents. Plaintiff is unopposed to the relief sought in this motion.

WHEREFORE, the LG Defendants respectfully request that the time in which LG Electronics, Inc. and LG Electronics U.S.A., Inc. are required to move, answer or otherwise respond to Plaintiff's Complaint for Patent Infringement be extended to and include November 16, 2015.

Date: August 14, 2015

Respectfully submitted,

By: /s/ Allen F. Gardner

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*Attorneys for Defendants LG Electronics, Inc.
and LG Electronics U.S.A., Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service, on this the 14th day of August, 2015.

/s/ Allen F. Gardner